## Sealed Public and unofficial staff access to this instrument are prohibited by court order

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

United States Courts Southern
District of Texas
FILED

October 19, 2023

Nathan Ochsner, Clerk of Court

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§	CRIMINAL NUMBER: 4:23-MJ-2018
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§	FILE UNDER SEAL
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## **MOTION TO SEAL**

The United States of America, by and through Alamdar S. Hamdani, United States Attorney, and the undersigned attorneys, for the Southern District of Texas, moves this Honorable Court to seal the complaint filed in the above-captioned case, the accompanying affidavit, arrest warrant, and this Motion and Order to Seal. In support thereof the United States would state the following:

The complaint and affidavit contains information regarding an ongoing criminal investigation and public exposure of the information would compromise the case and the arrest of this Defendant.

The United States respectfully requests that the complaint, affidavit, arrest warrant, and Motion and the accompanying Order be sealed for no more than 180 days, and that upon arrest of this Defendant, the complaint, affidavit, arrest warrant, and this Motion and Order be automatically unsealed without further Order of the Court.

The United States further requests that copies, including certified copies, of the complaint, arrest warrant, affidavit, and this Motion and Order be provided to the United States Attorney's Office, specifically, but not limited to, Assistant United States Attorneys Richard W. Bennett and Steven Schammel, the United States Marshals Service, and the investigating law enforcement

agency, Federal Bureau of Investigation, specifically, but not limited to Special Agent Keith Fogg upon his request and without further order of the Court.

Respectfully submitted,

ALAMDAR S. HAMDANI United States Attorney

BY: /s/ Richard W. Bennett

Richard W. Bennett Steven Schammel

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